IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
W. R. GRACE & CO., et al.,)	Case No. 01-1139 (JKF) Jointly Administered
Debtors.	ý	•
)	Hearing Date: October 23, 2006 at 2:00 p.m. Re: Docket Nos.: 11365 and 11522, 1341

DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF ITS MOTION FOR PROTECTIVE ORDER AGAINST ANDERSON MEMORIAL'S REQUESTS FOR 30(B)(6) DEPOSITIONS AND DOCUMENTS

The Debtors hereby request authority to file a reply in support of Debtors' Reply in Support of Motion for Protective Order Against Anderson Memorial's Requests for 30(B)(6) Depositions and Documents (Docket No. 11365) (the "Motion"). At the September 25, 2006 omnibus hearing, counsel for Anderson Memorial addressed the Court regarding its discovery effort and the Debtors seek authority to respond to issues raised at that time and to address the remaining issues with respect to the Motion.

WHEREFORE, the Debtors respectfully request the entry of an Order granting it authority to file the Reply, which is attached hereto as Exhibit 1.

Dated: October 13, 2006

KIRKLAND & ELLIS LLP David M. Bernick, P.C. Janet S. Baer 200 East Randolph Drive Chicago, Illinois 60601 Telephone: (312) 861-2000

Facsimile:

(312) 861-2200

and

PACHULSKI STANG ZIEHL YOUNG JONES & WEINTRAUB LLP

Laura Davis Jones (Bar No. 2436) James E. O'Neill (Bar No. 4042)

919 North Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: Facsimile:

(302) 652-4100 (302) 652-4400

Co-counsel for Debtors and Debtors in Possession

SO ORDERED this of October, 2006

The Honorable Judith K. Fitzgerald

Judith K. Ditygerald

United States Bankruptcy Judge